

REMARKS

Claims 1, 2, and 8-33 are pending in the present application.

Rejection under 35 U.S.C. §103

Claim 1 and 30-33 have been rejected under 35 U.S.C. §103 for being unpatentable over Brintzenhofe et al. (Published US Patent Application 2005/0223320) in view of McBrearty et al. (US Patent Number 6,744,452). This rejection is respectfully traversed.

In formulating the rejection of independent claim 1 under 35 U.S.C. §103, the Examiner alleges that Brintzenhofe et al. discloses, at paragraph [0011], a method for creating reusable composite components from interpreted pages of rendered document during dynamic document construction. Moreover, the Examiner alleges that Brintzenhofe et al. discloses, at paragraphs [0100] and [0111], caching individual reusable document components rendered to their respective bounding box dimensions; at paragraph [0113], permuting the reusable document components into composite combinations of reusable document components; at paragraph [0125], caching each of composite reusable document component rendered relative to each other in a bounding box of sufficient size to adequately contain the combination; at paragraph [0133], combining reusable document components in their relative positions to form composite reusable underlays; and, at paragraph [0134], caching said composite reusable underlays rendered to full page size.

However, the Examiner recognizes that Brintzenhofe et al. fails to disclose obtaining a list of document components from the page and identifying any non-cached components. To meet this deficiency in Brintzenhofe et al., the Examiner proposes to modify Brintzenhofe et al. with the teachings of McBrearty et al.

The Examiner alleges that McBrearty et al. discloses, at column 9, lines 28-34, obtaining a list of document components from the page and identifying any non-cached components.

Based upon these allegations, the Examiner concludes that the presently claimed invention would be obvious to one of ordinary skill in the art when considering Brintzenhofe et al. in view of McBrearty et al.

These allegations and conclusion are respectfully traversed.

Independent Claim 1

As set forth above, independent claim 1 recites a method for creating reusable composite components from interpreted pages of a document to be rendered during dynamic document construction, each interpreted page having cacheable reusable document components and non-cached document components. The method obtains a list of document components associated with an interpreted page, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page; identifies the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page; caches each identified cacheable reusable document component rendered to each identified cacheable reusable document component's respective bounding box dimensions; and caches a composite combination of a set of identified cacheable reusable document components rendered, relative to each identified cacheable reusable document component in the composite combination, in a bounding box of sufficient size to adequately contain the composite combination.

As noted above, the Examiner recognizes that Brintzenhofe et al. fails to disclose obtaining a list of document components from the page and identifying any non-cached components.

Moreover, Brintzenhofe et al. fails to disclose obtaining a list of document components associated with an interpreted page, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page.

Furthermore, Brintzenhofe et al. fails to disclose identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

With respect to McBrearty et al., the Examiner alleges that McBrearty et al. teaches that a web page is obtained from a server and a check is made to determine if non-cached components are present.

Notwithstanding the Examiner's assertion, the actual teachings of McBrearty et al. fail to support the Examiner's characterization of the process described by McBrearty et al. More specifically, McBrearty et al. teaches that when a web **page** is requested, the process checks to determine if the web **page** has been cached or not cached.

In contrast, the presently claimed invention clearly sets forth the obtainment of a list of document components associated with an interpreted page, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page.

Moreover, the presently claimed invention clearly sets forth that each interpreted page having cacheable reusable document components and non-cached document components.

Lastly, the presently claimed invention clearly sets forth the identification of the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

Checking if a web page has been cached, as taught by McBrearty et al., fails to teach or suggest obtaining a list of document components associated with an interpreted page, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page; and/or identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page, as set forth by independent claim 1.

In rebuttal, the Examiner asserts that the Examiner's rejection is based upon the combination of the references and that the Applicant has improperly argued the references individually. This assertion is respectfully traversed.

In formulating the rejection, the Examiner, explicitly states, on page 9 of the Office Action, that Brintzenhofe et al. teaches most of the claimed subject matter of claim 1, except "obtaining a list of document components from said page and identifying any non-cached components." Notwithstanding the Examiner's assertion, independent

claim 1 does not recite any limitation associated with “identifying any non-cached components.” Thus, this remark is not relevant to the claimed invention of claim 1.

Moreover, in rebuttal, the Examiner asserts that Brintzenhofe et al. teaches that a cacheable reusable document is identified as a file. Although Brintzenhofe et al. may teach that a cacheable reusable document is identified as a file, the claim language specifically recites, “identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.”

In other words, the claimed invention identifies cacheable reusable document components, not a document as taught by Brintzenhofe et al.

Furthermore, the claimed invention identifies cacheable reusable document components which are included in a list of document components. Since the Examiner explicitly recognizes that Brintzenhofe et al. fails to teach obtaining a list of document components from the page, it is respectfully submitted that it is technologically impossible for Brintzenhofe et al. to teach, as asserted by the Examiner, identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page because there is no list of documents components.

The Examiner also asserts that McBrearty et al. teaches that a web page is obtained from a server and a check is made to determine if non-cached components are present. McBrearty et al. fails to teach or suggest the generation of a list of document components wherein the list of document components includes cacheable reusable document components and non-cached document components associated with the interpreted page.

In summary, the Examiner recognizes that Brintzenhofe et al. fails to disclose obtaining a list of document components associated with an interpreted page cacheable reusable, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page; and/or identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

Moreover, McBrearty et al. fails to disclose or suggest obtaining a list of document components associated with an interpreted page cacheable reusable, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page; and/or identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

Therefore, contrary to the Examiner's allegations, the combination of Brintzenhofe et al. in view of McBrearty et al. fails to render the presently claimed invention, as set by independent claim 1, obvious to one of ordinary skill in the art.

Independent Claim 31

As set forth above, independent claim 31 recites a method for creating reusable composite components from interpreted pages of a document to be rendered during dynamic document construction, each interpreted page having cacheable reusable document components and non-cached document components. The method obtains a list of document components associated with an interpreted page, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page; identifies the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page; and caches, to form a composite reusable underlay, a combination of identified cacheable reusable document components rendered, relative to each identified cacheable reusable document component in the combination, to a full page size.

Brintzenhofe et al. fails to disclose obtaining a list of document components associated with an interpreted page cacheable reusable, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page.

Furthermore, Brintzenhofe et al. fails to disclose identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

With respect to McBrearty et al., as noted above, McBrearty et al. teaches that when a web page is requested, the process checks to determine if the web page has been cached.

In contrast, the presently claimed invention clearly sets forth the obtainment of a list of document components associated with an interpreted page cacheable reusable, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page.

Moreover, the presently claimed invention clearly sets forth that each interpreted page having cacheable reusable document components and non-cached document components.

Lastly, the presently claimed invention clearly sets forth the identification of the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

Checking if a web page has been cached, as taught by McBrearty et al., fails to teach or suggest obtaining a list of document components associated with an interpreted page cacheable reusable, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page; and/or identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page, as set forth by independent claim 31.

In rebuttal, the Examiner asserts that the Examiner's rejection is based upon the combination of the references and that the Applicant has improperly argued the references individually. This assertion is respectfully traversed.

In formulating the rejection, the Examiner, explicitly states, on page 9 of the Office Action, that Brintzenhofe et al. teaches most of the claimed subject matter of claim 1, expect "obtaining a list of document components from said page and identifying any non-cached components." Notwithstanding the Examiner's assertion, independent claim 1 does not recite any limitation associated with "identifying any non-cached components." Thus, this remark is not relevant to the claimed invention of claim 31.

Moreover, in rebuttal, the Examiner asserts that Brintzenhofe et al. teaches that a cacheable reusable document is identified as a file. Although Brintzenhofe et al. may teach that a cacheable reusable document is identified as a file, the claim language

specifically recites, “identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.”

In other words, the claimed invention identifies cacheable reusable document components, not a document as taught by Brintzenhofe et al.

Furthermore, the claimed invention identifies cacheable reusable document components which are included in a list of document components. Since the Examiner explicitly recognizes that Brintzenhofe et al. fails to teach obtaining a list of document components from the page, it is respectfully submitted that it is technologically impossible for Brintzenhofe et al. to teach, as asserted by the Examiner, identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page because there is no list of documents components.

The Examiner also asserts that McBrearty et al. teaches that a web page is obtained from a server and a check is made to determine if non-cached components are present. McBrearty et al. fails to teach or suggest the generation of a list of document components wherein the list of document components includes cacheable reusable document components and non-cached document components associated with the interpreted page.

In summary, the Examiner recognizes that Brintzenhofe et al. fails to disclose obtaining a list of document components associated with an interpreted page cacheable reusable, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page; and/or identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

Moreover, McBrearty et al. fails to disclose or suggest obtaining a list of document components associated with an interpreted page cacheable reusable, the list of document components including cacheable reusable document components and non-cached document components associated with the interpreted page; and/or identifying the cacheable reusable document components included in the obtained list of documents components associated with the interpreted page.

Therefore, contrary to the Examiner's allegations, the combination of Brintzenhofe et al. in view of McBrearty et al. fails to render the presently claimed invention, as set by independent claim 31, obvious to one of ordinary skill in the art.

Dependent Claims

With respect to dependent claims 30, 32, and 33, the Applicant, for the sake of brevity, will not address the reasons supporting patentability for these individual dependent claims, as these claims depend directly or indirectly from allowable independent claims 1 and 31. The Applicant reserves the right to address the patentability of these dependent claims at a later time, should it be necessary.

Accordingly, in view of the remarks set forth above, the Examiner is respectfully requested to reconsider and withdraw the rejection under 35 U.S.C. §103.

Rejection under 35 U.S.C. §103

Claim 2 has been rejected under 35 U.S.C. §103 for being unpatentable over Gauthier (Published US Patent Application 2004/0141197) in view of McBrearty et al. (US Patent Number 6,744,452). This rejection is respectfully traversed.

In formulating the rejection of independent claim 2 under 35 U.S.C. §103, the Examiner alleges that Gauthier discloses, at paragraph [0009], a method for rendering pages having a combination of reusable components and non-cached components. Moreover, the Examiner alleges that Gauthier discloses, at paragraph [0009], searching a cache of reusable underlays for underlays having the reusable document components needed by the page; at paragraph [0046], if the correct reusable underlay is not found in cache then generating a composite reusable underlay from the reusable document components of said page and caching said reusable underlay rendered to full page size; at paragraph [0047], creating a full page size overlay from the non-cached components that is retained until it is mated with the cached reusable underlay; at paragraph [0049], if the correct underlay is found in cache then retrieving the reusable underlay; and, at paragraph [0050], rendering, along with the overlay, the page therefrom.

However, the Examiner recognizes that Gauthier fails to disclose assessing the rendered page for the possibility of having an underlay-overlay pair. To meet this deficiency in Gauthier, the Examiner proposes to modify Gauthier with the teachings of McBrearty et al.

The Examiner alleges that McBrearty et al. discloses, at column 9, lines 28-34, assessing the rendered page for the possibility of having an underlay-overlay pair.

Based upon these allegations, the Examiner concludes that the presently claimed invention would be obvious to one of ordinary skill in the art when considering Gauthier in view of McBrearty et al.

These allegations and conclusion are respectfully traversed.

As set forth above, independent claim 2 recites a method for rendering pages having a combination of reusable components and non-cached components by assessing the rendered page for the possibility of having an underlay-overlay pair; searching, when the rendered page is accessed as having an underlay-overlay pair, a cache of reusable underlays for underlays having the reusable document components needed by the page; if the correct reusable underlay is not found in cache then generating a composite reusable underlay from the reusable document components of said page and caching the reusable underlay rendered to full page size; creating a full page size overlay from the non-cached components that is retained until it is mated with the cached reusable underlay; if the correct underlay is found in cache then retrieving the reusable underlay; and, rendering, along with the overlay, the page therefrom.

As noted above, the Examiner recognizes that Gauthier fails to disclose assessing the rendered page for the possibility of having an underlay-overlay pair.

With respect to McBrearty et al., the Examiner alleges that McBrearty et al. teaches that a web page is obtained from a server and a check is made to determine if non-cached components are present. The Examiner asserts that the Applicant teaches an underlay-overlay pair implies cached and non-cached components.

Notwithstanding the Examiner's assertion, the actual teachings of McBrearty et al. fail to support the Examiner's characterization of the process described by McBrearty et al. More specifically, McBrearty et al. teaches that when a web **page** is requested, the process checks to determine if the web **page** has been cached, not components of the page.

In contrast, the presently claimed invention clearly sets forth assessing the rendered page for the possibility of having an underlay-overlay pair.

Checking if an entire web page has been cached, as taught by McBrearty et al., fails to teach or suggest assessing the rendered page for the possibility of having an underlay-overlay pair, as set forth by independent claim 2.

In rebuttal, the Examiner asserts that the specification defines an underlay-overlay pair as being a pair of cached and non-cached document components. Given this interpretation, McBrearty et al. fails to disclose assessing the rendered page for the possibility of having an underlay-overlay pair.

More specifically, the Examiner asserts that McBrearty et al. teaches that a web page is checked for non-cached components. The Applicant respectfully submits that checking for non-cached components fails to teach or suggest assessing the rendered page for the possibility of having an underlay-overlay pair.

In summary, the Examiner recognizes that Gauthier fails to disclose assessing the rendered page for the possibility of having an underlay-overlay pair. Moreover, McBrearty et al. fails to disclose or suggest assessing the rendered page for the possibility of having an underlay-overlay pair because McBrearty et al. discloses checking if an entire web page has been cached.

Therefore, contrary to the Examiner's allegations, the combination of Gauthier in view of McBrearty et al. fails to render the presently claimed invention, as set by independent claim 2, obvious to one of ordinary skill in the art.

Accordingly, in view of the remarks set forth above, the Examiner is respectfully requested to reconsider and withdraw the rejection under 35 U.S.C. §103.

Rejection of Claims 8-27 under 35 U.S.C. §103

Claims 8-27 have been rejected under 35 U.S.C. §103 for being unpatentable over Gauthier (Published US Patent Application 2004/0141197) in view of Brintzenhofe et al. (Published US Patent Application 2005/0223320) and Freund (US Patent Number 5,870,769). This rejection is respectfully traversed.

It is noted that although the Examiner has indicated that claims 17-27 have been rejected under 35 U.S.C. §103 for being unpatentable over Gauthier (Published US Patent Application 2004/0141197) in view of Brintzenhofe et al. (Published US Patent

Application 2005/0223320) and Freund (US Patent Number 5,870,769), the Examiner has failed to provide any arguments to support such an assertion.

Therefore, with respect to claims 17-27, the Examiner has failed to establish a prima facie case of obviousness under 35 U.S.C. §103.

Accordingly the rejection of claims 17-27 under 35 U.S.C. §103 for being unpatentable over Gauthier (Published US Patent Application 2004/0141197) in view of Brintzenhofe et al. (Published US Patent Application 2005/0223320) and Freund (US Patent Number 5,870,769) should be immediately withdrawn.

Independent Claim 8

In formulating the rejection of independent claim 8 under 35 U.S.C. §103, the Examiner alleges that the combined teachings of Gauthier and Brintzenhofe et al. disclose an apparatus for processing documents each represented by a document description encoded in a page description language supportive of reusable data.

Moreover, the Examiner alleges that the combined teachings of Gauthier and Brintzenhofe et al. disclose a page description language interpreter that receives the document description; an imager, communicating with the interpreter, that creates image representations of received document components.

Lastly, the Examiner alleges that the combined teachings of Gauthier and Brintzenhofe et al. disclose a reusable document component repository that stores image representations derived from a plurality of processed documents, the reusable document component repository communicating with the interpreter and the imager to supply those ones of the image representations corresponding to selected document components of the processed documents and to receive selected image representations created by the imager during the processing of documents.

However, the Examiner recognizes that Gauthier fails to disclose a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

The Examiner also recognizes that Brintzenhofe et al. fails to disclose a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

To meet this deficiency in the combined teachings of Gauthier and Brintzenhofe et al., the Examiner proposes to modify the combined teachings of Gauthier and Brintzenhofe et al. with the teachings of Freund.

The Examiner alleges that Freund discloses, at column 2, lines 32-44, a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Based upon these allegations, the Examiner concludes that the presently claimed invention would be obvious to one of ordinary skill in the art when considering Gauthier in view of Brintzenhofe et al. and Freund.

These allegations and conclusion are respectfully traversed.

As set forth above, independent claim 8 recites an apparatus for processing documents each represented by a document description encoded in a page description language supportive of reusable data. The apparatus includes a page description language interpreter that receives the document description and parses the document description into reusable document components.

The page description language interpreter combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

The apparatus also includes an imager, communicating with the interpreter, that creates image representations of received document components; and a reusable document component repository that stores image representations derived from a plurality of processed documents, the reusable document component repository communicating with the interpreter and the imager to supply those ones of the image representations corresponding to selected document components of the processed documents and to receive selected image representations created by the imager during the processing of documents.

As noted above, the Examiner recognizes that the combined teachings of Gauthier and Brintzenhofe et al. fail to disclose a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

With respect to Freund, the Examiner alleges that Freund teaches that the visual characteristics of a displayed link status indicator, which indicates if the document is stored in cache. Moreover, the Examiner alleges that Freund teaches if the user selects a link status indicator, the document is stored in cache without displaying the document to the user.

Notwithstanding the Examiner's assertions with respect to the teachings of Freund, the Applicant respectfully request an explanation demonstrating how the Examiner's characterization of the teachings of Freund has any relevance to a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

It is respectfully submitted that displaying a link status indicator in such a manner to indicate if the document is stored in cache is irrelevant to a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Furthermore, it is respectfully submitted that the selecting of a link status indicator so that a document is stored in cache without displaying the document to the user is irrelevant to a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

In rebuttal, the Examiner has failed to how the displaying of a link status indicator teaches a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

More specifically, the teachings of Freund are not directed to composites of reusable document components. Thus, teachings of Freund fail to provide any basis for the Examiner's assertion that the prior art teaches a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Therefore, contrary to the Examiner's assertions, Freund fails to disclose a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

In summary, the Examiner recognizes that the combined teachings of Gauthier and Brintzenhofe et al. fail to disclose a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Moreover, Freund fails to disclose or suggest a page description language interpreter that combines some of the reusable document components into composites of reusable document components and combines some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Therefore, contrary to the Examiner's allegations, the combination of Gauthier in view of Brintzenhofe et al. and Freund fails to render the presently claimed invention, as set by independent claim 8, obvious to one of ordinary skill in the art.

Dependent Claims

With respect to dependent claims 9-16, the Applicants, for the sake of brevity, will not address the reasons supporting patentability for these individual dependent claims, as these claims depend directly or indirectly from allowable independent claim 8. The Applicants reserve the right to address the patentability of these dependent claims at a later time, should it be necessary.

Accordingly, in view of the remarks set forth above, the Examiner is respectfully requested to reconsider and withdraw the rejection under 35 U.S.C. §103.

Rejection of Claims 17-27 under 35 U.S.C. §103

Claims 17-27 have been rejected under 35 U.S.C. §103 for being unpatentable over Gauthier (Published US Patent Application 2004/0141197) in view of Brintzenhofe et al. (Published US Patent Application 2005/0223320). This rejection is respectfully traversed.

In formulating the rejection of independent claim 17 under 35 U.S.C. §103, the Examiner alleges that Gauthier discloses, at paragraph [0009], receiving a document description including at least one selected reusable document component. Moreover, the Examiner alleges that Gauthier discloses, at paragraph [0047], querying a reusable document component repository containing stored image representations of reusable document components to locate a selected stored image representation corresponding to the selected reusable document component; and at paragraph [0048], conditional upon the querying, identifying one of the stored image representations as corresponding

to the selected reusable document component and retrieving the selected stored image representation corresponding to the selected reusable document component.

The Examiner also alleges that Gauthier discloses, at paragraph [0046], not identifying one of the stored image representations as corresponding to the selected reusable document component, generating an image representation for the selected reusable document component, and storing the generated image representation in the reusable document component repository; and, at paragraph [0050], converting the document description to a document image representation, the converting including incorporating the selected or generated image representation corresponding to the selected reusable document into the document image representation.

However, the Examiner recognizes that Gauthier fails to disclose combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

To meet this deficiency in Gauthier, the Examiner proposes to modify Gauthier with the teachings of Brintzenhofe et al.

The Examiner alleges that Brintzenhofe et al. discloses, at paragraph [0150], combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Based upon these allegations, the Examiner concludes that the presently claimed invention would be obvious to one of ordinary skill in the art when considering Gauthier in view of Brintzenhofe et al.

These allegations and conclusion are respectfully traversed.

With respect to the Examiner's formulation of the rejection, the Examiner has made inconsistent statements.

The Examiner stated at page 18 of the Office Action, dated December 17, 2009, that Brintzenhofe et al. fails to disclose combining some of the reusable document components into composites of reusable document components and combining some of

the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Moreover, the Examiner asserts that the teachings of Freund must be combined with the teachings of Gauthier and Brintzenhofe et al. to show combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Either Brintzenhofe et al. discloses combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays or Brintzenhofe et al. fails to disclose combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays. Both positions cannot be correct.

Therefore, based upon this inconsistency of positions, with respect to the teachings of Brintzenhofe et al., the Examiner has failed to establish a prima facie case of obviousness under 35 U.S.C. §103.

Accordingly the rejection of claims 17-27 under 35 U.S.C. §103 for being unpatentable over Gauthier (Published US Patent Application 2004/0141197) in view of Brintzenhofe et al. (Published US Patent Application 2005/0223320) should be immediately withdrawn.

Notwithstanding the Examiner's failure to properly formulate a viable rejection, the Applicant will address the deficiencies in the teachings of Gauthier and Brintzenhofe et al.

As set forth above, independent claim 17 recites a document construction method. The method receives a document description including at least one selected reusable document component and combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays; queries a reusable document component repository containing stored image representations of reusable

document components to locate a selected stored image representation corresponding to the selected reusable document component; conditional upon the querying, identifies one of the stored image representations as corresponding to the selected reusable document component and retrieving the selected stored image representation corresponding to the selected reusable document component, or, not identifying one of the stored image representations as corresponding to the selected reusable document component, generates an image representation for the selected reusable document component, and stores the generated image representation in the reusable document component repository; and converts the document description to a document image representation, the converting including incorporating the selected or generated image representation corresponding to the selected reusable document into the document image representation.

With respect to Brintzenhofe et al., the Examiner alleges that Brintzenhofe et al. teaches the adding of content to the composition. Moreover, the Examiner alleges that the adding of content to the composition, as taught by Brintzenhofe et al., discloses combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Contrary to the Examiner's assertions, although Brintzenhofe et al. discloses, at paragraph [0150], the adding of content to the composition, such a teaching is not relevant to combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

More specifically, the adding of content to an existing composition does not teach the combining of reusable document components into composites of reusable document components. Moreover, the adding of content to an existing composition does not teach the combining of reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

The Examiner has failed to provide any reasoning or argument that would demonstrate how the adding of content to an existing composition teaches combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

In rebuttal, the Examiner re-asserts that Brintzenhofe et al. discloses combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays, notwithstanding the Examiner's explicitly comments on page 18 which asserts the contrary.

Again, it is respectfully submitted that the Examiner has taken irreconcilable positions with respect to the teachings of Brintzenhofe et al., thereby rendering this rejection unsustainable.

Brintzenhofe et al. fails to disclose combining some of the reusable document components into composites of reusable document components and combining some of the reusable document components with respect to the relative positions of the reusable document components into composites of reusable underlays.

Therefore, contrary to the Examiner's allegations, the combination of Gauthier in view of Brintzenhofe et al. fails to render the presently claimed invention, as set by independent claim 17, obvious to one of ordinary skill in the art.

Dependent Claims

With respect to dependent claims 18-29, the Applicants, for the sake of brevity, will not address the reasons supporting patentability for these individual dependent claims, as these claims depend directly or indirectly from allowable independent claim 17. The Applicants reserve the right to address the patentability of these dependent claims at a later time, should it be necessary.

Accordingly, in view of the remarks set forth above, the Examiner is respectfully requested to reconsider and withdraw the rejection under 35 U.S.C. §103.

Entry of Amendments under 37 C.F.R. 1.116

The Examiner is respectfully requested to enter the above amendments under 37 C.F.R. 1.116 because the amendments merely correct typographical errors in the previously submitted version of the claims 1 and 31. Moreover, the Examiner is respectfully requested to enter the above amendments under 37 C.F.R. 1.116 because the amendments place the application in condition for allowance and materially reduce and simplify the issues, thereby placing the application in better condition for Appeal. Lastly, the Examiner is also respectfully requested to enter the above amendments under 37 C.F.R. 1.116 because the amendments do not require any further consideration and/or search and do not raise the issue of new matter. Accordingly, entry of these amendments under 37 C.F.R. 1.116 is proper.

CONCLUSION

Accordingly, in view of all the reasons set forth above, the Examiner is respectfully requested to reconsider and withdraw the present rejections. Also, an early indication of allowability is earnestly solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Michael J. Nickerson', with a stylized, cursive script.

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